

In this case, such an order would be appropriate because the attached warrant relates to an ongoing criminal investigation that is not public nor is its full extent known to the target of the investigation, and its disclosure may alert the target to the nature of the ongoing investigation. I have concerns that the target of this investigation may destroy evidence if alerted of the status of the investigation. Accordingly, there is reason to believe that notification of the existence of the

attached warrant will seriously jeopardize the investigation or unduly delay a trial, including by giving the target an opportunity to destroy or tamper with evidence, change patterns of behavior, intimidate potential witnesses, or endanger the life or physical safety of an individual. *See* 18 U.S.C. § 2705(b). Some of the evidence in this investigation is stored electronically. If alerted to the existence of the warrant, the subject under investigation could destroy that evidence.

WHEREFORE, the United States respectfully requests that the Court grant the attached Order directing Facebook, Inc. not to disclose the existence or content of the attached warrant for approximately 180 days, except that Facebook, Inc. may disclose the attached warrant to an attorney for Facebook, Inc. for the purpose of receiving legal advice.

The United States further requests that the Court order that this application and any resulting order be sealed until further order of the Court. As explained above, these documents discuss an ongoing criminal investigation that is neither public nor fully known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

SCOTT W. MURRAY
United States Attorney

Dated: January 8, 2021

By: /s/ Charles L. Rombeau
Charles L. Rombeau
Assistant U.S. Attorney